

Message

From: McEvoy, Molly [mcevoy.molly@epa.gov]
Sent: 3/5/2020 7:26:52 PM
To: Laura Sorey [Laura.Sorey@LA.GOV]
CC: Graves, Brian [Graves.Brian@epa.gov]; Harvill, Jana [Harvill.Jana@epa.gov]
Subject: RE: Crosswalk Question

Hi Laura,

Thanks for sending your questions via email. You're correct that a Class VI well plugging plan would be updated according to 40 CFR 146.

As you noted, 40 CFR 144.41(g) and 40 CFR 144.52(a)(6) are in the UIC Program Crosswalk, but I do not see either in the Class VI crosswalk in the [Class VI Primacy Manual for State Directors](#). These sections do not need to be included in Louisiana's Class VI crosswalk. Per 40 CFR 144.52(a), "Permits for owners or operators of Class VI injection wells shall include conditions meeting the requirements of subpart H of part 146. Permits for other wells shall contain the following requirements, when applicable."

Please let us know if you have any further questions.

Thanks,
Molly

Molly McEvoy
Office of Ground Water & Drinking Water
U.S. Environmental Protection Agency
Washington, D.C.
Phone: 202-564-4765

From: Laura Sorey <Laura.Sorey@LA.GOV>
Sent: Thursday, March 5, 2020 9:15 AM
To: McEvoy, Molly <mcevoy.molly@epa.gov>
Cc: Graves, Brian <Graves.Brian@epa.gov>
Subject: Crosswalk Question

Hey Molly,

After our conversation yesterday, I realized that I was conflating two different issues and then asking the wrong question. So this is the revised attempt.

I'm looking **40 CFR 144.41(g)** on the crosswalk. It references amending a "plugging and abandonment plan which has been updated under **40 CFR 144.52(a)(6)**." §144.52(a)(6) is referenced separately as a federal requirement in the full primacy crosswalk but isn't included as a requirement in the Director's Manual version.

(6) After a cessation of operations of two years the owner or operator shall plug and abandon the well in accordance with the plan unless he:

- (i) Provides notice to the Regional Administrator;*
- (ii) Describes actions or procedures, satisfactory to the Regional Administrator, that the owner or operator will take to ensure that the well will not endanger USDWs during the period of temporary abandonment. These actions and procedures shall include compliance with the technical requirements applicable to active injection wells unless waived by the Regional Administrator.*

Normally I would think that the plan referenced in §144.41(g) would be updated with respect to the actual injection well plugging section **40 CFR 146.92** rather than the above subsection. Is that reasonable or am I overlooking something?

Thanks,
Laura

Laura Sorey, PG

Petroleum Scientist

Department of Natural Resources

Office of Conservation

Injection & Mining Division

P.O. Box 94275

Baton Rouge, LA 70804-9275

☎ 225-342-5581

☎ 225-242-3441

✉ Laura.Sorey@LA.GOV

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